ALLIANCE FOR
EXCELLENT EDUCATION

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

In the Matter of	)	
	)	
Modernizing the E-Rate Program for	)	WC Docket No. 13-184
Schools and Libraries	)	

REPLY COMMENTS FROM THE ALLIANCE FOR EXCELLENT EDUCATION ON THE NOTICE OF PROPOSED RULEMAKING FOR MODERNIZING THE E-RATE PROGRAM FOR SCHOOLS AND LIBRARIES

TABLE OF CONTENTS

I. INTRODUCTION AND SUMMARY

The Alliance for Excellent Education (the Alliance) is pleased to submit reply comments in response to comments submitted to the Federal Communications Commission (the Commission) regarding the modernization of the E-rate program. The Alliance urges the Commission to revise the regulations governing the E-rate program to ensure their application during the next funding year (beginning July 1, 2014).

The comments to follow will build on the Alliance's original filing and will focus on three recommendations:

- **Expand the availability of the E-rate program.** Determine the amount of the cap based on an estimate of the cost associated with achieving specific capacity goals by the dates specified in President Obama's ConnectEd proposal.

- **Set ambitious capacity goals.** Set ambitious national benchmarks for bandwidth capacity within schools and districts that take into consideration the individual circumstances of each eligible entity.

- **Facilitate "anytime, anyplace" learning.** Modernize E-rate by allowing the program to more effectively facilitate learning that takes place outside the classroom.

II. EXPAND THE AVAILABILITY OF THE E-RATE PROGRAM

The global economy demands an upgrade in the nation's system of public education. Although more than 20 percent of America's students do not graduate from high school on time, if at all,[1] the job market is requiring increasing levels of education. A high school diploma is no longer sufficient; by 2018, two-thirds of the nation's jobs will require some level of postsecondary education.[2]

Technology has been demonstrated to be a "force multiplier" in the education arena. However, too few educators are using technology effectively to strengthen instruction, in part, due to limited broadband capacity.[3] High-speed broadband is a critical element of the infrastructure that must be in place in order to upgrade the nation's education system. Therefore, the Alliance associates itself with the many individuals and organizations urging the Commission to increase the cap on E-rate in order to expand the impact of this critical program.

In considering the level to which the cap should be raised, the Alliance urges the Commission to increase the E-rate cap based on estimates of the funding levels needed to achieve ambitious but

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[1] R. Stillwell and J. Sabel, *Public School Graduates and Dropouts from the Common Core of Data: School Year 2009-10: First Look (Provisional Data)* (NCES 2013-3090) (Washington, DC: U.S. Department of Education, 2013).

[2] A. Carnevale, N. Smith, J. Strohl, *Help Wanted: Projections of Jobs and Education Requirements Through 2018* (Washington, DC: Georgetown University Center on Education and the Workforce,2010).

[3] T. Schwartzbeck, *The Digital Learning Imperative: How Technology and Teaching Meet Today's Education Challenges* (Washington, DC: Alliance for Excellent Education, 2012).

achievable broadband capacity goals (see section III below) by the dates called for by the administration's ConnectED initiative.

Specifically, the Universal Service Administrative Company estimates demand for the 2013 funding year to be $4.986 billion, which is more than twice that of the funding available under the cap.[4] The Alliance urges the Commission to acknowledge that this level of demand is based on the current E-rate program that seeks to bring internet connectivity to schools and libraries, rather than an enhanced "E-rate 2.0" that should support a twenty-first-century digital learning infrastructure. For example, the LEAD Commission estimates that the cost of wiring each middle school classroom to be $7.1 billion today, and $5.0 billion in 2015.[5] This figure does not include the cost of connecting the nation's 16,000 high schools, which likely have greater connectivity needs than middle schools. A comprehensive estimate should be established by the Commission and used as a baseline for ensuring that all schools are connected to robust broadband within five years.

In addition, the Alliance acknowledges that several filings reference the need to limit the burden of cost to consumers that could result from raising the E-rate cap. The Alliance respects this concern and urges the Commission to take appropriate and necessary steps to prevent waste, fraud, and abuse. This notwithstanding, the Alliance believes that the weight of an antiquated education system is a far greater burden to the nation's economy than the minor cost adjustment to consumers that could result from the modernization and expansion of the E-rate program.

III. SET AMBITIOUS CAPACITY GOALS

The Alliance associates itself with the numerous filings that express support for shifting the focus of E-rate from increasing participation in the program to increasing the broadband capacity of eligible entities. The Alliance urges the Commission to set ambitious national benchmarks for bandwidth capacity within schools and districts that take into consideration the individual circumstances of each eligible entity.

Specifically, the Alliance supports the sentiment expressed by the Education and Libraries Networks Coalition,[6] the American Library Association,[7] and Cisco,[8] of setting capacity goals that are based on the number of end users. In addition, the Alliance suggests that the grade span of a school be taken into consideration when setting capacity goals. For example, a large high school utilizing multimedia content, video conferencing, and other high-speed bandwidth

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[4] M. Blackwell, "In the Matter of Schools and Libraries Universal Service Support Mechanism," memo from Universal Service Administrative Company to Julie Veach, April 22, 2013, http://www.usac.org/_res/documents/sl/pdf/tools/news/FY2013-Demand-Estimate.pdf (accessed September 13, 2013).

[5] L. Bollinger et al., *Paving a Path Forward for Digital Learning in the United States* (Washington, DC: LEAD Commission, 2013).

[6] See page 18 of Education and Libraries networks Coalition comments submitted September 16, 2013 to the Commission on "Modernizing the E-Rate Program for Schools and Libraries" WC Docket No. 13-184, *Notice of Proposed Rulemaking* ("E-rate NPRM").

[7] See page 11 of American Library Association comments submitted September 16, 2013 to the Commission for E-rate NPRM.

[8] See pages 16, 21 of Cisco comments submitted September 16, 2013 to the Commission for E-rate NPRM.

applications that provide students with the opportunity to learn increasingly complex content and apply that knowledge in real-world situations will require more capacity than smaller elementary schools.

Among the ambitious national bencharks for bandwidth capacity that warrant consideration are the targets outlined by the State Educational Technology Directors Association and President Obama's ConnectED initiative (100 Mbps per 1,000 users by School Year (SY) 2014–15, increasing to 1 Gbps per 1,000 users by SY 2017–18),[9] as well as the targets recommended by Cisco (1 Gbps per 2,000 students by 2014, increasing to 4 Gbps per 2,000 students in 2018).[10]

Additionally, it is important to note that the Commission will need to accompany capacity targets with a reliable method of determining whether or not they have been met. The Alliance concurs with the National Cable & Telecommunications Association[11] and the American Cable Association[12] that the Commission should investigate and recommend accurate ways applicants can assess their bandwidth and determine their needs. This will allow the Commission to collect reliable data about actual bandwidth capacity at funded sites.

IV. FACILITATE "ANYTIME, ANYPLACE" LEARNING

The traditional classroom is no longer the sole setting in which learning takes place. Particularly at the high school level, it is critical for students to utilize content knowledge to solve problems and experience the application of academic learning in real-world settings. Such opportunities can be provided to students through partnerships developed by schools and school districts with community-based organizations.

Moreover, technology now allows students to benefit from learning opportunities outside of regular school hours, ranging from extra tutoring provided on-line to flipped classrooms that allow students to view a classroom lecture at home and come to class prepared for discussion. Unfortunately, many students are unable to take advantage of these opportunities because they lack sufficient internet access outside of schools and libraries.

The Alliance urges the Commission to modernize E-rate by allowing the program to more effectively facilitate learning that takes place outside the classroom. The Alliance encourages the Commission to consider how E-rate funding could be used to support home connections for students with the highest needs through district-level initiatives that will allow students to effectively participate in and complete classroom-related activities. The Alliance supports the sentiment expressed in filings submitted by the following companies/organizations to ensure E-

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[9] White House Office of the Press Secretary, ConnectED, "President Obama's Plan for Connecting All Schools to the Digital Age," http://www.whitehouse.gov/sites/default/files/docs/connected_fact_sheet.pdf (accessed September 10, 2013).

[10] Cisco, *High Speed Broadband in Every Classroom: The Promise of a Modernized E-Rate Program* (San Jose, CA: Author, 2013).

[11] See page 17 of National Cable & Telecommunications Association comments submitted September 16, 2013 to the Commission for E-rate NPRM.

[12] See page 6 of American Cable Association comments submitted September 16, 2013 to the Commission for E-rate NPRM.

rate supports "anytime, anyplace" learning: Sprint,[13] Hispanic Information and Telecommunications Network,[14] National Hispanic Media Coalition,[15] American Library Association,[16] and Cisco.[17]

V. CONCLUSION

The modernization and expansion of E-rate can help transform American education into a more effective system that will prepare today's students for tomorrow's workforce. Technology has revolutionized many facets of modern life, but the promise of digital learning is only beginning to be implemented at scale in today's classrooms. For the United States to continue to be the world's leading economic power it must depend upon the quality of education received by its students. The Alliance urges the Commission to have the appropriate policies and priorities in place by the next program funding year in order for this critical element of education infrastructure to effectively bring the nation's classrooms into the digital age.

[13] See pages 6–7 of Sprint comments submitted September 16, 2013 to the Commission for E-rate NPRM.
[14] See page 3 of Hispanic Information and Telecommunications Network comments submitted September 16, 2013 to the Commission for E-rate NPRM.
[15] See pages 2–3 of National Hispanic Media Coalition comments submitted September 16, 2013 to the Commission for E-rate NPRM.
[16] See pages 6–8 of American Library Association comments submitted to the Commission for E-rate NPRM.
[17] See Exhibit A, pages 5, 34 of Cisco comments submitted to the Commission for E-rate NPRM.